UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA ASHEVILLE DIVISION CIVIL ACTION NO. 1:23-CV-00020

CLARA M. MANN,

Plaintiff,

DEFENDANT TRAILS CAROLINA, LLC'S MOTION FOR IN CAMERA

REVIEW OR, IN THE ALTERNATIVE, MOTION TO SEAL

v.

TRAILS CAROLINA, LLC,

Defendant.

NOW COMES Defendant Trails Carolina, LLC (hereinafter "Defendant"), by and through undersigned counsel, and hereby moves the Court for an *in camera* review of the Supplemental Amended Disclosure by Party or Intervenor in a Diversity Case. In the alternative, Defendant requests that the Supplemental Amended Disclosure by Party or Intervenor in a Diversity Case be made under seal, pursuant to Local Rule 6.1(c), and subject to a protective order. In support of this Motion, Defendant submits the *Memorandum of Law in Support of Defendant's Motion for In Camera Review or, in the Alternative, Motion to Seal* filed contemporaneously herewith and incorporated herein by reference.

This the 1st day of August, 2023.

HEDRICK GARDNER KINCHELOE & GAROFALO LLP

By: /s/ Kristy M. D'Ambrosio

DAVID L. LEVY
NC State Bar No. 34060
KRISTY M. D'AMBROSIO
NC State Bar No. 52817
4201 Congress St, Suite 300
Charlotte, NC 28209
Phone: 704-366-1101
Fax: 704-366-6181

dlevy@hedrickgardner.com kdambrosio@hedrickgardner.com Attorneys for Defendant Trails Carolina,

LLC

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of filing to the following:

Shaun C. Blake
Jenkins M. Mann
Rogers Lewis Jackson Mann & Quinn LLC
1901 Main Street, Suite 1205
Columbia, SC 29201
sblake@rogerslewis.com
jmann@rogerslewis.com
F: (803) 252-3653
Attorneys for Plaintiff

This the 1st day of August, 2023.

/s/ Kristy M. D'Ambrosio
KRISTY M. D'AMBROSIO